

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)
)
Plaintiff,) Civil Action No. 3:09-CV-620 (REP)
)
v.)
)
LAWSON SOFTWARE, INC.,)
)
)
)
Defendant.)

**ePLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S
PROPOSED EXHIBIT LIST FOR CONTEMPT PROCEEDINGS**

Pursuant to Section 15(c) of the Court's Scheduling Order as amended, Plaintiff ePlus, Inc. ("ePlus"), through counsel, hereby submits the following general and specific objections to Defendant Lawson Software, Inc. ("Lawson")'s proposed exhibit list for contempt proceedings:

General Objections

1. Documents potentially excluded pursuant to the Court's rulings on pending motions to strike. Defendant's Trial Exhibit List includes documents which may be excluded, either explicitly or implicitly based on the Court's anticipated rulings on pending motions to strike.

2. Documents not previously disclosed during discovery or pursuant to Court Order.
ePlus also objects generally to the introduction of any evidence which, though it may be relevant to Lawson's defenses, was not previously disclosed during discovery or in its responses to ePlus's interrogatories.

3. Relevance. *ePlus objects generally to Lawson's introduction of any evidence having no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable and to the introduction of evidence wherein the probative value of that evidence is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence.*

4. Exhibits not disclosed. *ePlus reserves its right to present additional objections to exhibits not yet disclosed to *ePlus* by Lawson, including, but not limited to, Lawson Exhibits DX 516, DX 517 and DX 518.*

5. Attorney comment or argument. *ePlus objects generally to Lawson's attempt to introduce, as substantive evidence, litigation documents including discovery responses, deposition transcripts, briefs filed with the Court and correspondence amongst the attorneys. These documents are not evidence and should not be presented as such in the contempt hearing.*

KEY FOR EXHIBIT OBJECTIONS

Reference	Basis for Objection
106	Fairness requires admission of other evidence contemporaneously.
401/402	The evidence in the exhibit is not relevant and is not admissible.
403	Any relevance of the exhibit is substantially outweighed by the danger of unfair prejudice, confusion of the issues, misleading the jury, or considerations of unfair delay, waste or confusion of the issues, misleading the jury, or considerations of unfair delay, waste of time, or needless presentation of cumulative evidence.
801/802/805	The exhibit contains or is hearsay and no exception applies and/or the exhibit contains or is hearsay within hearsay and no exception applies.
901	The exhibit lacks authentication.
1006	The evidence in the exhibit includes improper summary of evidence.
FRCP 26	Not timely disclosed.
MIL	Subject of motion <i>in limine</i> .
NR	Exhibit not received—all objections are reserved.
INACC	Inaccurate or incomplete description of exhibit.

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-500				27-Jan-11	Signed verdict form		X							X	
DX-501				4-Jan-11	Transcript of merits trial (Opening Statement) (pages 112-196)	X	X		X					X	
DX-502				4-Jan-11	Transcript of merits trial (Testimony of Douglas Momyer) (pages 216-399)	X	X		X					X	
DX-503				5-Jan-11	Transcript of merits trial (Testimony of Jim Johnson) (pages 448-480)	X	X		X					X	
DX-504				5-Jan-11	Transcript of merits trial (Testimony of Alfred Weaver) (pages 482-510)	X	X		X					X	
DX-505				6-Jan-11	Transcript of merits trial (Testimony of Alfred Weaver) (pages 517-922)	X	X		X					X	
DX-506				7-Jan-11	Transcript of merits trial (Testimony of Hannah Raleigh) (pages 934-976)	X	X		X					X	
DX-507				11-Jan-11	Transcript of merits trial (Testimony of Keith Lohkamp) (pages 993-1152).	X	X		X					X	
DX-508				11-Jan-11	Transcript of merits trial (Testimony of Dale Christopherson) (pages 1154-1636)	X	X		X					X	
DX-509				12-Jan-11	Transcript of merits trial (Testimony of Patrick Niemeyer) (pages 1218-1298)	X	X		X					X	
DX-510				13-Jan-11	Transcript of merits trial (Testimony William Yuhasz) (1677-1711)	X	X		X					X	
DX-511				13-Jan-11	Transcript of merits trial (Testimony of Michael Shamos) (pages 1723-1778)	X	X		X					X	
DX-512				14-Jan-11	Transcript of merits trial (Testimony of Michael Shamos) (pages 1792-1948)	X	X		X					X	
DX-513				20-Jan-11	Transcript of merits trial (Testimony of Brooks Hilliard) (pages 2656-2792)	X	X		X					X	
DX-514				24-Jan-11	Transcript of merits trial (Closing Arguments) (pages 3085-3230)	X	X		X					X	
DX-515				24-Jan-11	Jury instructions (pages 3232-3290)	X	X								
DX-516					Sample server cookie before release								X		X
DX-517					Sample server cookie after release								X		X
DX-518					Sample server cookie								X		X
DX-519	PX-376			20-Jan-12	Goldberg Report Ex. 1 – Video – Weaver Merits Trial UNSPSC demonstration								X		

Specific Objections

Def. No.	Pt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-520	PX-1135			20-Jan-12	Goldberg Report Ex. 2 – Video – Weaver Contempt Report UNSPSC demonstration										Stipulated Exhibit
DX-521	PX-368			20-Jan-12	Golberg Report Ex. 3 – Video – Weaver Merits Trial Two Punchout demonstration								X		
DX-522	PX-380			20-Jan-12	Goldberg Report Ex. 4 – Video – Weaver Merits Trial Item Master / Punchout demonstration								X		
DX-523				20-Jan-12	Goldberg Report Ex. A – Goldberg CV				X						
DX-524	PX-11			20-Jan-12	Goldberg Report Ex. F – UNSPSC white paper										Stipulated Exhibit
DX-525	PX-1166	RQC0000744	RQC0000744		Source code	X	X	X					X		X
DX-526	PX-1167	RQC0000745	RQC0000745		Source code	X	X	X					X		X
DX-527	PX-1172	RQC0000746	RQC0000746		Source code differences file	X	X	X					X		X
DX-528	PX-1168	RQC0000747	RQC0000747		Source code	X	X	X					X		X
DX-529	PX-1169	RQC0000748	RQC0000748		“Lawson 4GL Diff Document”	X	X	X					X		X
DX-530	PX-1173	RQC0000749	RQC0000749		Source code differences file	X	X	X					X		X
DX-531	PX-1170	RQC0000750	RQC0000750		Source code differences file	X	X	X					X		X
DX-532	PX-1171	RQC0000751	RQC0000751		Source code differences files	X	X	X					X		X
DX-533	PX-1159	RQC0000730	RQC0000730		“Important Notice: Recommended Patch Available for Procurement Punchout Customers”										Stipulated Exhibit
DX-534	PX-1160	RQC0000731	RQC0000731		“Patch for Requisition Center 9.0.1 Now Available”										Stipulated Exhibit
DX-535				6-May-11	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X					
DX-536				18-May-11	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X					
DX-537				16-Jun-11	Letter from Scott Robertson to Daniel McDonald re: ePlus, inc. v. Lawson Software, Inc.		X	X	X	X					
DX-538				24-Jun-11	Letter from Scott Robertson to Daniel McDonald re: ePlus inc. v. Lawson Software, Inc.		X	X	X	X					
DX-539				28-Jun-11	Letter from Daniel McDonald to Scott Robertson re: ePlus Inc. v. Lawson Software, Inc.		X	X	X	X					
DX-540				1-Jul-11	Letter from Scott Robertson to Daniel McDonald re: ePlus, inc. v. Lawson Software, Inc.		X	X	X	X					
DX-541				6-Jul-11	Letter from Daniel McDonald to Scott Robertson re: ePlus Inc. v. Lawson Software, Inc.		X	X	X	X					
DX-542				13-Jul-11	Letter from William Schulz to Scott Robertson re: ePlus, inc. v. Lawson Software, Inc.		X	X	X	X					

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Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-543	PX-1				U.S. Patent No. 6,023,683										Stipulated Exhibit
DX-544	PX-3				U.S. Patent No. 6,505,172										Stipulated Exhibit
DX-545				4-Jan-11	Weaver Trial Demonstratives	X	X	X					X		
DX-546				30-Mar-11	Lawson Opposition to Motion for Permanent Injunction		X	X	X	X					
DX-547				1-Apr-11	ePlus Reply to Motion for Permanent Injunction		X	X	X						
DX-548				4-Apr-11	Transcript of April 4, 2011 injunction hearing	X	X	X	X						
DX-549	PX-1088	RQC2282399	RQC2282402	7-Mar-11	2012.01.06 Deposition of Dean Hager – Exhibit 4 – Email from Mike Cohen to Bruce McPheeters FWD: CUE Demo Plans, need help										Stipulated Exhibit
DX-550	PX-1090	RQC0026599	RQC0026602	25-Mar-11	2012.01.06 Deposition of Dean Hager – Exhibit 6 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 9 – Email from K. Lohkamp to D. Hager RE: Questions										Stipulated Exhibit
DX-551		RQC0054042	RQC0054042	10-May-11	Email from Jim Catalino to Dean Hager RE: Anything on e-Plus? I have staff meeting and wanted to provide update thx		X	X	X						
DX-552	Px-1111	RQC2091954	RQC2091959	26-May-11	2012.01.06 Deposition of Dean Hager – Exhibit 28 – Email from Jennifer Langer to Guy Leduc et al. FW: Supporting Materials for Mtg 2:00 – RE: project team for ePlus (and										Stipulated Exhibit
DX-553		RQC2125837	RQC2125837	13-Apr-11	Email from Brad Nauman to Jeff Hvass et al. FW: ePlus		X	X	X	X					
DX-554		RQC0922446	RQC0922446	25-Apr-11	Email from Dean Hager to Darci Snyder Re: Clarity on mobile reqs		X	X	X						
DX-555		RQC0870441	RQC0870443	9-May-11	Email from Jennifer Langer to Michael Poling et al. URGENT: Your Action Required for Q4 Opportunities and Beyond (S3 Requisitions Self Service)				X						
DX-556	PX-1096	RQC0914942	RQC0914945	9-Jun-11	2012.01.06 Deposition of Dean Hager – Exhibit 12 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 8 – Email from D. Christopherson to D. Hager, B. McPheeters et al. RE: RQC Patch 1 updated										Stipulated Exhibit
DX-557	PX-1037	RQC0000636	RQC0000637	3-Jun-11	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 08 – “Decommission Notice – S3 Requisitions Self-Service”										Stipulated Exhibit
DX-558	PX-1104	RQC0000732	RQC0000738	27-May-11	“Immediate replacement of Requisitions Self Service software products required.”										Stipulated Exhibit
DX-559		RQC0762337	RQC0762343	1-Jun-11	“Immediate replacement of Requisitions Self Service software products required.”										No Objections
DX-560		RQC0000724	RQC0000725	27-May-11	“Immediate Support Stop for M3 e-Procurement solution required.”		X		X						

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-561	PX-1033	RQC0109373	RQC0109373	5-Oct-11	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 04 – Spreadsheet – Customer List					X	X	X		X	
DX-562				19-Dec-11	Spreadsheet – Customer List (update of October 5, 2011 version)										
DX-563	PX-1035	RQC0561907	RQC0561909		2011.12.21 Deposition of Elizabeth Homewood – Exhibit 06 – “Timeline for ePlus Patent Litigation (ERH)”										
DX-564		RQC2091962	RQC2091963	24-May-11	Email from J. Langer to A. Gerum and A. Pettersson FW: update on PM tasks re: RSS		X	X	X						
DX-565		RQC2076749	RQC2076750	29-May-11	Email from N. Anderson to R. Umali et al. re: PLEASE READ – Important Content		X	X	X						
DX-566		RQC0915427	RQC0915428	1-Jun-11	Email from E. Homewood to N. Anderson RE: ePlus – Status Update		X	X	X						
DX-567		RQC0004126	RQC0004126	2-Jun-11	Email from E. Homewood to ORG-All Support & Delivery re: IMPORTANT – PLEASE READ: Knowledge Base unavailable externally		X	X	X						
DX-568	PX-1156	RQC0000722	RQC0000722	18-May-11	“Lawson S3 Requisition Center is generally available today – May 18th, 2011.”										
DX-569		RQC0915431	RQC0915432		“External Communications”		X	X	X	X					
DX-570		RQC0113758	RQC0113759		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-571		RQC0113765	RQC0113775		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-572		RQC0113784	RQC0113785		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-573		RQC0113807	RQC0113814		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-574		RQC0113826	RQC0113829		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-575		RQC0113855	RQC0113856		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-576		RQC0113869	RQC0113870		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-577		RQC0113907	RQC0113908		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-578		RQC0113998	RQC0114035		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-579		RQC0114052	RQC0114053		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-580		RQC0114340	RQC0114346		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-581		RQC0114433	RQC0114434		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-582		RQC0114771	RQC0114772		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-583		RQC0115382	RQC0115382		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-584		RQC0116773	RQC0116774		Excerpt from “Cases with RSS Dialogue”	X	X	X	X						
DX-585	PX-1060	RQC0109375	RQC0109375		2011.12.29 Deposition of Scott Hanson – Exhibit 10 – “RQC SWAT Cases” spreadsheet										

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-586	PX-1195	RQC0111357	RQC0111366	22-Aug-11	"Lawson Consulting Services – RQC SWAT Team Financial Update"										Stipulated Exhibit
DX-587		RQC0355362	RQC0355362	27-May-11	Email from S. Hanson to TEAM-Scott Hanson, TEAM-Mark Deustch, and TEAM-Joey Alcazar re: Installation/patching of RSS		X	X	X						
DX-588		RQC0017353	RQC0017354	27-May-11	Email from B. Offenbacher to S. Hanson and M. Roisum RE: Greenville RSS Install		X	X	X						
DX-589		RQC2296568	RQC2296570	28-May-11	Email from C. Bennett to S. Merten re: Team call notes and CRITICAL UPDATE – PLEASE REVIEW ASAP				X						
DX-590	PX-1152	RQC0000348	RQC0000363	May-11	Lawson Requisition Center Installation Guide, Version 9.0.1 (IBM)										Stipulated Exhibit
DX-591	PX-1059	RQC0000364	RQC0000379	Jun-11	2011.12.29 Deposition of Scott Hanson – Exhibit 08 – Lawson Requisition Center Installation Guide, Version 9.0.1 (Unix/Windows)										Stipulated Exhibit
DX-592		RQC2588002	RQC2588003	26-May-11	Email from J. Langer to K. Ross et al. re: Key Message Update...effort will take on average 8 hours per customer to implement RQC				X						
DX-593	PX-1061	RQC0109374	RQC0109374		2011.12.29 Deposition of Scott Hanson – Exhibit 11 – "RQC SWAT Activities" spreadsheet										Stipulated Exhibit
DX-594	PX-1012	RQC0000384	RQC0000384	May-11	2011.12.19 Deposition of Dale Christopherson – Exhibit 20 – Lawson Requisition Center User Guide, Version 9.0.1										Stipulated Exhibit
DX-595	PX-1157	RQC0000723	RQC0000723		"Requisition Center: Courses from Lawson Learning"										Stipulated Exhibit
DX-596	PX-1163	RQC0000741	RQC0000741	3-Jun-11	"Requisition Center" Training Course Video										Stipulated Exhibit
DX-597		RQC2656377	RQC2656380	22-Jun-11	Email from T. Olson-Stepp to D. Hager FW: RQC SWAT status – June 20 2011		X	X	X						
DX-598		RQC0920557	RQC0920558	1-Jun-11	Email from S. Hanson to T. Olson-Stepp re: RQC Disgruntled Client		X	X	X						
DX-599		RQC0921185	RQC0921188	Sept. 7, 2011	Email from E. Homewood to I. Svensson RE: Urgent: Please Read and take action ASAP (RSS) (Confidential)		X	X	X						
DX-600		RQC2348838	RQC2348840	Sept. 27, 2011	Email from H. Raleigh to J. Bennet et al. re: RQC Migration Status Update		X	X	X	X					
DX-601		RQC0922088	RQC0922093	1-Jun-11	Email from I. Svensson to M. Vince et al. RE: A message from Dean Hager – RQC now available free of charge to replace				X	X					
DX-602		RQC2235393	RQC2235394	25-May-11	Email from J. Langer to M. McIntyre et al. FW: RSS Lawsuit – Effects on Cobb Energy				X	X					

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-603	PX-1002	RQC0000638	RQC0000655	3-Jun-11	2011.12.19 Deposition of Dale Christopherson – Exhibit 07 – "Introducing Lawson Requisition Center Webinar"										Stipulated Exhibit
DX-604	PX-1046	RQC0365676	RQC0365679	3-Feb-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 4 – Email from K. Lohkamp to K. Knuth and D. Snyder Re:ePlus discussions										Stipulated Exhibit
DX-605	PX-1019	RQC2291408	RQC2291410	25-Apr-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 7 – Email from K. Lohkamp to D. Snyder, D. Kemper, J. Langer RE: Please Read: Additional suggested change to the Requisition Center										Stipulated Exhibit
DX-606	PX-1113	RQC0883191	RQC0883229	3-Jun-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 10 – Presentation: Introducing Lawson Requisition Center										Stipulated Exhibit
DX-607	PX-1105	RQC0869062	RQC0869093	3-Jun-11	Deposition of Keith Lohkamp – Exhibit 11 – Email from J. Langer to N. Anderson FW: LRC webinar follow-up: questions and recordings w/ attachment LRC Question and Answers.txt										Stipulated Exhibit
DX-608		RQC0117217	RQC0117227	8-Apr-11	Requisition Center Launch Project Charter										No Objections
DX-609	PX-1115	RQC0590893	RQC0590903	2-May-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 13 – Email and attachment, Lawson Requisition Center, How To Sell										Stipulated Exhibit
DX-610	PX-1116	RQC2300171	RQC2300173	18-May-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 14 – Email from D. Christopherson to D. Kempker, J. Langer et al. RE: Recommendation on next steps for RSS and RQC										Stipulated Exhibit
DX-611		RQC2256291	RQC2256305	7-Jun-11	2012.01.06 Deposition of Keith Lohkamp -Exhibit 15 -Email from D. Christopherson to J. Mulchrone and T. Dooner FW: Updated FAQs for Legal Review and Posting on Globe										No Objections
DX-612				19-Sep-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 17 – Declaration of Kurt Reasoner					X					
DX-613	PX-1120	RQC0023552	RQC0023554	September 15, 2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 18 –Email from Kurt Reasoner to Keith Lohkamp FW: Estimated RQC Implementation Costs dated September 15, 2011 and undated attachment, RQC Implementation										Stipulated Exhibit
DX-614	PX-1121	RQC0023547	RQC0023548	16-Sep-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 19 – Email from Dan Azevedo to Kurt Reasoner and Keith Lohkamp RE: RSS Replacement Cost Estimate, dated September 16, 2011										Stipulated Exhibit

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-615	PX-1122	RQC2131310	RQC2131312	16-Sep-11	2012.01.06 Deposition of Keith Lohkamp – Exhibit 20 – Email from Keith Lohkamp to Jordan Ekelin FW: RSS Replacement Cost Estimate dated September 16, 2011 and undated attachment, RSS Replacement Application Implementation										Stipulated Exhibit
DX-616		RQC0822274	RQC0822274	8-Feb-11	Email from Dale Christopherson to Keith Lohkamp Urgent: Your help needed with battle plan against ePlus		X	X	X	X					
DX-617	PX-1014	RQC0868679	RQC0868679	18-Feb-11	Email from D. Christopherson to K. Lohkamp Re: Initial thoughts on the 683 patent infringement by Punch-out										Stipulated Exhibit
DX-618	PX-1021	RQC2273418	RQC2273419	3-Jun-11	Email from D. Hager to K. Lohkamp RE: Need Decision and Input on New Requested Change to RQC Related to Procurement Punchout										Stipulated Exhibit
DX-619		RQC2076803	RQC2076803	Undated	"RSS Injunction Plan" Excel spreadsheet		X	X	X	X					
DX-620	PX-1018	RQC0822226	RQC0822227	18-Mar-11	Email from D. Christopherson to K. Lohkamp RE: GoToMeeting Invitation – SciQuest and Lawson, Healthcare Solutions Demonstrations										Stipulated Exhibit
DX-621		RQC2253556	RQC2253557	6-Jun-11	Email from K. Lohkamp to G. Benton RE: Call notes – Version Dependencies for RQC		X	X	X	X					
DX-622		RQC2120905_1	RQC2120905_33	7-Jun-11	"Lawson Requisition Center Field Enablement" presentation			X	X	X					
DX-623	PX-1068	RQC0870774	RQC0870777	2-Jun-11	Email from K. Lohkamp to D. Davidson Re: RSS to Req Center Upgrade										Stipulated Exhibit
DX-624	PX-1010	RQC0000656	RQC0000690	3-Jun-11	Introducing Lawson Requisition Center										Stipulated Exhibit
DX-625	PX-1011	RQC0000695	RQC0000708	May-11	Lawson Requisition Center Overview										Stipulated Exhibit
DX-626	PX-1000	RQC0000001	RQC0000046		Lawson Procurement Punchout and PO Dispatcher Installation and Administration Guide for Lawson Applications 8.1.x and 9.x Version 9.0.1.4										Stipulated Exhibit
DX-627		RQC2736391	RQC2736394		RQC Service Ticket 162 re: RQC Performance degradation as number of requisition lines increases										No Objections
DX-628		RQC2270553	RQC2270554	10-Jun-11	Email from D. Christopherson re Q&A and Patch 1										No Objections
DX-629		RQC0860711			Spreadsheet detailing hours spent on RQC										No Objections
DX-630		RQC0849279			Spreadsheet detailing hours spent on RQC				X	X	X	X			
DX-631		RQC0118131			Lawson Requisition Center User Guide										No Objections
DX-632		EPLUSPT000315	EPLUSPT000316	1-Jun-11	Email from Kley Parkhurst to Ken Farber et al. FW: Lawson Injunction.....		X	X	X	X					
DX-633		EPLUSPT000319	EPLUSPT000320	3-Jun-11	Email from Ken Farber to raosu@trinity-health.org. FW: Lawson Injunction.....		X	X	X	X					

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-634	PX-1080	RQC2741643	RQC2741643	2011	2012.01.05 Deposition of Kevin Samuelson – Exhibit 10 – License Revenue Spreadsheet; PDF and Excel versions										Stipulated Exhibit
DX-635	PX-1081	RQC2741644	RQC2741644	2011	2012.01.05 Deposition of Kevin Samuelson – Exhibit 12 – Maintenance Revenue Spreadsheet; PDF and Excel versions										Stipulated Exhibit
DX-636	PX-1082	RQC2741645	RQC2741645	2011	2012.01.05 Deposition of Kevin Samuelson – Exhibit 15 – Service Revenue Spreadsheet; PDF and Excel versions										Stipulated Exhibit
DX-637	PX-1074	RQC2741646	RQC2741646	2011	2012.01.05 Deposition of Kevin Samuelson – Exhibit 4 – Profit-and-Loss Statement Spreadsheet; PDF and Excel versions										Stipulated Exhibit
DX-638				22-Dec-11	Defendant Lawson Software, Inc.'s Supplemental Responses to Plaintiff ePlus Inc.'s First Set of Interrogatories for Contempt Proceedings – Supplemental responses to interrogatories 11 and 12										No Objections
DX-639				20-Feb-11	Defendant Lawson Software, Inc.'s Supplemental Responses to Plaintiff ePlus Inc.'s First Set of Interrogatories for Contempt Proceedings – Supplemental responses to interrogatories 11 and 12				X		X		X		
DX-640					Designated portions of the 2012.01.05 Deposition Transcript of Kevin Samuelson		X		X						
DX-641	PX-1075				2012.01.05 Deposition of Kevin Samuelson – Exhibit 5: Lawson License Revenues (January 2011-November 2011)										Stipulated Exhibit
DX-642	PX-1076				2012.01.05 Deposition of Kevin Samuelson – Exhibit 6: Lawson Maintenance Revenues (January 2011-November										Stipulated Exhibit
DX-643	PX-1077				2012.01.05 Deposition of Kevin Samuelson – Exhibit 7: Lawson US FY11 (May 31, 2011) Actual P&L Profit by Product SKUs										Stipulated Exhibit
DX-644	PX-1078				2012.01.05 Deposition of Kevin Samuelson – Exhibit 8: Product SKUs										Stipulated Exhibit
DX-645					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 3, Schedule A: Calculation of Lawson incremental profits on accused sales				X	X	X				
DX-646					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 3, Schedule B: Calculation of Lawson net profits on accused sales				X	X	X				
DX-647					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 3, Schedule C: Calculation of ePlus gross profits on accused sales				X	X	X				

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-648					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 4: Effects of isolated corrections to Dr. Ugone's calculations				X	X	X				
DX-659					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 5: Summary of Lawson accused sales				X	X	X				
DX-650					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 5, Schedule A: Summary of Lawson accused sales: license and maintenance revenues				X	X	X				
DX-651					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 5, Schedule B: Summary of Lawson accused sales: service revenues				X	X	X				
DX-652					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6: Summary of Lawson license and maintenance revenues to prohibited customers (May 23 – Nov. 30)				X	X	X				
DX-653					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6, Schedule A: Summary of Lawson license and maintenance revenues to prohibited non-healthcare customers (May 23 – Nov. 30)				X	X	X				
DX-654					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6, Schedule B: Summary of Lawson license and maintenance revenues to prohibited healthcare customers (May 23 – Nov. 30)				X	X	X				
DX-655					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7: ePlus income statement (FY Q3:2011 – Q2:2012)				X	X	X				
DX-656					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Lawson income statement: Americas region (FY 2011)				X	X	X				
DX-657					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8, Schedule A: Lawson income statement: Americas region (FY 2011): profit margins for license, maintenance, and service revenues				X	X	X				
DX-658					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8, Schedule B: Regression results to determine Lawson's incremental margin				X	X	X				

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-659					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8, Schedule C: Lawson incremental profit				X	X	X				
DX-660					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 9: Computation of an upper bound on ePlus's portfolio royalty rate				X	X	X				
DX-661					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 9, Schedule A: ePlus' projected licensed sales				X	X	X				
DX-662					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 9, Schedule B: Summary of ePlus patent licenses/settlements				X	X	X				
DX-663					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 10: eProcurement market shares				X	X	X				
DX-664					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 10, Schedule A: eProcurement market presence				X	X	X				
DX-665					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 11: Compensatory Damages				X	X	X		X		
DX-666					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 11, Schedule A: Revenue and compensatory damages from disputed exempt sales				X	X	X		X		
DX-667					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Summary of RSS/RQC customers				X	X	X				
DX-668					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12, Schedule A: List of customers in prohibited configurations				X	X	X				
DX-669					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 1: ePlus damages demands and Lawson's accused revenue				X	X	X		X		
DX-670					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 2: Product mapping of Lawson software				X	X	X				
DX-671					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 3: Breakdown of Lawson revenues: accused and non-accused				X	X	X				
DX-672					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 4: ePlus's implied one-way royalty rate from SAP and Ariba agreements				X	X	X		X		

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC
DX-673					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 5: Lawson quarterly sales and marketing expenses vs. revenues vs (2000-2011)				X	X	X				
DX-674					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 6: Quarterly % changes in Lawson revenues vs. sales & marketing expenses 2000 -2011				X	X	X				
DX-675		RQC2164103	RQC2164106	30-May-01	Lawson Software End User Agreement Master Terms and Conditions with Detroit Medical Center	X			X						
DX-676		L0161206	L0161229	18-Sep-01	Lawson Software Product License Agreement with National Freight, Inc.	X			X						
DX-677		L0228075	L0228078	31-Aug-04	Lawson Software End User Agreement Master Terms and Conditions with Pomona Valley Hospital Medical Center	X			X						
DX-678		L0305236	L0305319	21-Aug-07	Lawson Software Customer Agreement with Heartland Regional Medical Center	X			X						
DX-679		ePLUS0949075	ePLUS0949075	26-Apr-10	Income Statement – ePlus Systems		X	X							
DX-680					ePlus 10-K Forms (2009-2011)		X	X					X		
DX-681	PX-690				<i>The Forrester Wave: eProcurement Solutions, Q1 2011</i>										
DX-682					ePlus, Inc. Statement of Profit and Loss Fiscal Years ending March 31		X	X					X		
DX-683	PX-109			2009	Lawson Annual 10-K Forms (2009)										
DX-684	Px-440			2010	Lawson Annual 10-K Forms (2010)										
DX-685				2011	Lawson Annual 10-K Forms (2011)							X		X	
DX-686					Lawson Financial Data 2000-2011 downloaded from Thomson Financial				X			X		X	
DX-687	PX-1087	RQC2357668	RQC2357671	9-Jun-11	2012.01.05 Deposition of Kevin Samuelson – Exhibit 25 – Email from Christy Gustafson to Bruce McPheeters RE: ePlus – follow up re customer counts										

Respectfully Submitted,

February 22, 2012

/s/
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Attorneys for Plaintiff, ePlus Inc

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of February, 2012, I will electronically file the foregoing

**ePLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S
PROPOSED EXHIBIT LIST FOR CONTEMPT PROCEEDINGS**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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